

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BRAVE BULK TRANSPORT LTD.,

07 Civ. 4546 (CM)

Plaintiff,

NOTICE OF MOTION

-against-

SPOT ON SHIPPING LTD., a.k.a. SPOT
ON SHIPPING LTD. BVI, a.k.a. SPOT ON,
a.k.a. CLAYTON STAR COMPANY LIMITED
a.k.a. CLAYTON STAR and PHEW ASSET
MANAGEMENT LIMITED a.k.a. PEHW ASSET
MANAGEMENT LTD. and ZHANGGANG SHIPPING
LIMITED,

Defendant.

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PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law and all the prior pleadings and proceedings in this action, defendant ZHANGGANG SHIPPING LIMITED (ZSL), will move the Court before the Honorable Colleen McMahon at the Courthouse located at 500 Pearl Street, New York, New York, for an order, pursuant to Rules 52 and 59 of the Federal Rules of Civil Procedure, granting reconsideration of the Court's order dated October 30, 2007, and, upon reconsideration, vacating, dissolving, and quashing the process of maritime attachment and garnishment issued pursuant to the Court's Amended Ex Parte Order dated July 9, 2007 and entered on July 10, 2007, or, in the alternative, pursuant to 28 U.S.C. § 1292 certifying an interlocutory appeal, and granting to ZSL such other and further relief as this Honorable Court may deem just and proper.

Dated: New York, New York
November 13, 2007

MAHONEY & KEANE, LLP
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ZHANGGANG SHIPPING LIMITED

By: 

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